

OPEN MEETING AGENDA ITEM



0000150104

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

ORIGINAL

2014 JAN 31 P 12:57

ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission

DOCKET

JAN 31 2014

DOCKETED BY

BOB STUMP  
CHAIRMAN  
GARY PIERCE  
COMMISSIONER  
BRENDA BURNS  
COMMISSIONER  
BOB BURNS  
COMMISSIONER  
SUSAN BITTER SMITH  
COMMISSIONER

IN THE MATTER OF ARIZONA PUBLIC  
SERVICE COMPANY REQUEST FOR  
APPROVAL OF UPDATED GREEN POWER  
RATE SCHEDULE GPS-1, GPS-2, AND GPS-3.

Docket No. E-01345A-10-0394

IN THE MATTER OF THE APPLICATION OF  
ARIZONA PUBLIC SERVICE COMPANY FOR  
APPROVAL OF ITS 2013 RENEWABLE  
ENERGY STANDARD IMPLEMENTATION  
FOR RESET OF RENEWABLE ENERGY  
ADJUSTOR.

Docket No. E-01345A-12-0290

IN THE MATTER OF THE APPLICATION OF  
TUCSON ELECTRIC POWER COMPANY FOR  
APPROVAL OF ITS 2013 RENEWABLE  
ENERGY STANDARD IMPLEMENTATION  
PLAN AND DISTRIBUTED ENERGY  
ADMINISTRATIVE PLAN AND REQUEST  
FOR RESET OF ITS RENEWABLE ENERGY  
ADJUSTOR.

Docket No. E-01933A-12-0296

IN THE MATTER OF THE APPLICATION OF  
UNS ELECTRIC, INC. FOR APPROVAL OF  
ITS 2013 RENEWABLE ENERGY STANDARD  
IMPLEMENTATION PLAN AND  
DISTRIBUTED ENERGY ADMINISTRATIVE  
PLAN AND REQUEST FOR RESET OF ITS  
RENEWABLE ENERGY ADJUSTOR.

Docket No. E-04204A-12-0297

RUCO'S RESPONSE TO STAFF'S POSSIBLE AMENDMENTS

The Residential Utility Consumer Office (RUCO) appreciates Staff's willingness to clarify a few  
important elements of the Recommended Opinion and Order (ROO). Since the underlying ROO was

1 based on Staff's Alternative Track and Monitor proposal, Staff is in the best position to provide guidance  
2 and interpretation.

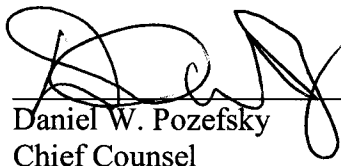
3 After review, RUCO believes that the amendments provide useful direction and clarify key issues  
4 that might lead to disagreement down the road. Respectfully, RUCO has one small, yet important edit to  
5 Staff's language in the first paragraph:

6 "In order to assist the Commission in determining whether the waiver  
7 request is in the public interest, the waiver request shall ~~include~~ *be*  
8 *based on* the capacity of distributed generation installed in each of the  
9 previous five (5) calendar years and installed to date in the current  
10 calendar year, broken out by technology type, customer class, those  
11 receiving upfront incentives, those receiving performance based  
incentives and those receiving no incentives."

12 This change makes it abundantly clear that the unit of measurement is capacity. This will help ensure that  
13 Arizona does not inadvertently make a claim on the renewable energy credits of an individual, company,  
14 or governmental entity.

15 In sum, RUCO supports the Staff amendments as modified and encourages the Commission to  
16 adopt them. Also, RUCO may have additional comments or policy recommendations unrelated to the  
17 ROO once other parties respond to Staff's amendments.

18  
19 RESPECTFULLY SUBMITTED this 31<sup>st</sup> day of January, 2014.  
20

21  
22   
23 Daniel W. Pozefsky  
24 Chief Counsel

1 AN ORIGINAL AND THIRTEEN COPIES  
2 of the foregoing filed this 31st day of January,  
2014 with:

3 Docket Control  
4 Arizona Corporation Commission  
5 1200 West Washington  
6 Phoenix, Arizona 85007

COPIES of the foregoing hand delivered/  
mailed this 31st day of January, 2014 to:

7 Teena Jibilian  
8 Administrative Law Judge  
9 Hearing Division  
10 Arizona Corporation Commission  
11 1200 West Washington  
12 Phoenix, Arizona 85007

C. Webb Crockett  
Patrick J. Black  
Fennemore Craig  
2394 E. Camelback Rd, Suite 600  
Phoenix, AZ 85012-2913  
Attorneys for Freeport-McMoRan and AECC

13 Janice Alward, Chief Counsel  
14 Legal Division  
15 Arizona Corporation Commission  
16 1200 West Washington  
17 Phoenix, Arizona 85007

Kevin Koch  
2333 E. 1<sup>st</sup> Street  
P.O. Box 42103  
Tucson, AZ 85733

18 Steve Olea, Director  
19 Utilities Division  
20 Arizona Corporation Commission  
21 1200 West Washington  
22 Phoenix, Arizona 85007

Court S. Rich  
Rose Law Group, PC  
6613 N. Scottsdale Rd., Suite 200  
Scottsdale, AZ 85250  
Attorneys for SEIA

23 Thomas A. Loquvam  
24 Pinnacle West Capital Corporation  
400 N. 5<sup>th</sup> Street, MS 8695  
Phoenix, AZ 85004  
Attorney for Arizona Public Service Co.

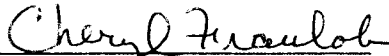
Michael L. Neary, Executive Director  
AriSEIA  
111 W. Renee Dr.  
Phoenix, AZ 85027

Michael W. Patten  
Roshka DeWulf & Patten, PLC  
One Arizona Center  
400 E. Van Buren Street, Suite 800  
Phoenix, AZ 85004  
Attorneys for Tucson Electric Power  
and UNS Electric, Inc.

Timothy Hogan  
Arizona Center for Law in the Public Interest  
202 E. McDowell Rd., Suite 153  
Phoenix, AZ 85004  
Attorneys for WRA

1 Christopher D. Thomas  
Fred E. Breedlove III  
2 Squire Sanders  
1 E. Washington, 27<sup>th</sup> Floor  
3 Phoenix, AZ 85004  
Attorneys for Sonoran Solar, LLC  
4  
Scott S. Wakefield  
5 Ridenour Hienton & Lewis, PLLC  
201 N. Central Ave., Suite 330  
6 Phoenix, AZ 85004-1052  
Attorneys for Wal-Mart Stores, Inc. and  
7 Sam's West, Inc.  
8  
Kyle J. Smith  
Regulatory Law Office (JALS-RL/IP)  
9 Office of the Judge Advocate General  
U.S. Army Legal Service Agency  
10 9275 Gunston Road  
Fort Belvoir, VA 22060-5546  
11 Attorney for United States Department of  
Defense and all other Federal Executive  
12 Agencies  
13  
Douglas V. Fant  
Law Offices of Douglas V. Fant  
14 3655 W. Anthem Way, Suite A-109  
PMB 411  
15 Anthem, AZ 85086  
Attorney for Interwest Energy Alliance  
16

17 By



18 Cheryl Faulob  
19  
20  
21  
22  
23  
24